

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

IN RE: AQUEOUS FILM-FORMING  
FOAMS PRODUCTS LIABILITY  
LITIGATION

MDL No. 2:18-mn-2873-RMG

**This Document Relates to  
ALL CASES**

**THIRD JOINT MOTION FOR EXTENSION OF BRIEFING DEADLINES FOR  
DEFENDANTS' MOTIONS TO DISMISS FOR FAILURE TO COMPLY WITH  
SECOND AMENDED CMO NO. 28**

Pursuant to Local Civ. Rule 6.01 (D.S.C.), Co-Lead Counsel for Plaintiffs and Defendants jointly move to extend the briefing deadlines for Defendants' motions to dismiss for failure to comply with Second Amended Case Management Order No. 28. [ECF Nos. 6980, 6982, 6983, 6984, 6985, 6986 ("CMO 28 Motions to Dismiss")].

1. Defendants filed the above-referenced motions to dismiss on April 14, 2025. Pursuant to Local Civ. Rules 7.06 and 7.07, Plaintiffs' response to those motions were initially due on April 28, 2025.

2. On April 25, the Co-Lead Counsel for Plaintiffs and Defendants jointly moved to extend the briefing deadlines associated with those motions to make Plaintiffs oppositions due on May 19, 2025 and Defendants' replies due on June 2, 2025. [ECF No. 7041]. The Court granted that motion on April 29, 2025. [ECF No. 7059].

3. On May 15, Co-Lead Counsel for Plaintiffs and Defendants jointly moved to further extend the briefing deadlines associated with the CMO 28 Motions to Dismiss [ECF No. 7137] to

make oppositions due on June 9, 2025 and replies (if any) due on June 23, 2025. The Court granted that motion on May 20, 2025. [ECF NO. 7149.]

4. The purpose of this motion for extension of time, as well as the two prior motions for extension of time filed with the Court [ECF Nos. 7041 and 7137], is to give the parties time to meet and confer regarding certain plaintiffs identified in the CMO 28 Motions to Dismiss, and where appropriate, withdraw or vacate the motions with respect to certain plaintiffs or resolve claims via stipulation of dismissal or other means.

5. Counsels' meet and confer efforts continue to be productive. However, given the high volume of plaintiffs and claims included in the CMO 28 Motions to Dismiss, the Co-Leads jointly request an additional 21-day extension of the briefing deadlines associated with the CMO 28 Motions to Dismiss.

6. Accordingly, the parties propose that Plaintiffs' time to respond to Defendants' CMO 28 Motions to Dismiss be extended to June 30, 2025, and Defendants' replies, if any, be extended to July 14, 2025.

WHEREFORE, Co-Lead Counsel for Plaintiffs and Defendants respectfully request that the Court enter an Order extending the time for Plaintiffs to respond to Defendants' CMO 28 Motions to Dismiss to June 30, 2025 and for Defendants' replies, if any, to July 14, 2025.

Dated: June 3, 2025

Respectfully submitted,

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